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MARVELL TECHNOLOGY GROUP, LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

CARTER BRANTNER, Individually and on  
Behalf of All Others Similarly Situated

Plaintiff,

vs.

MARVELL TECHNOLOGY GROUP, LTD.,  
SEHAT SUTARDJA and GEORGE A.  
HERVEY,

Defendants.

Case No. C-06-06441-SI

**STIPULATION AND [PROPOSED]  
ORDER REGARDING DEFENDANTS'  
RESPONSE TO COMPLAINT**

1 **RECITALS**

2 WHEREAS plaintiffs filed this securities class action complaint on October 16,  
3 2006, Dkt. 1 (“Complaint”) alleging that defendants Marvell Technology Group Ltd., Sehat  
4 Sutardja and George A. Hervey (collectively, “Defendants”) engaged in certain conduct  
5 which allegedly violated federal securities laws and California law;

6 WHEREAS other plaintiffs have filed three other securities class action complaints  
7 alleging much of the same conduct: (1) *Harriet Goldstein, individually and on behalf of all*  
8 *others similarly situated, Plaintiff, v. Sehat Sutardja, Weili Dai, Pantas Sutardja, George A.*  
9 *Hervey, and Marvell Technology Group, Ltd., Defendants*, No. C-06-06286-RMW; (2)  
10 *Timothy Mahrt, individually and on behalf of all others similarly situated, Plaintiff, v. Sehat*  
11 *Sutardja, Weili Dai, Pantas Sutardja, George A. Hervey and Marvell Technology Group,*  
12 *Ltd., Defendants*, No. C-06-06731-SBA; and (3) *Shawn M. Perry, individually and on*  
13 *behalf of all others similarly situated, Plaintiff v. Marvell Technology Group Ltd., Sehat*  
14 *Sutardja, Weili Dai, Pantas Sutardja and George A. Hervey, Defendants*, No. C-06-07039-  
15 JSW.

16 WHEREAS certain of the claims in this class action arise under the Private  
17 Securities Litigation Reform Act of 1995;

18 WHEREAS the undersigned counsel anticipate that a motion (or motions) will be  
19 filed to appoint lead plaintiff(s) and, if necessary, to consolidate any actions involving some  
20 or all of the same claims (e.g., motions under 15 U.S.C. § 78u-4(a)(3)) and that, once lead  
21 plaintiffs are chosen, lead plaintiffs may wish to file a consolidated amended complaint;  
22 and

23 WHEREAS the undersigned counsel agree that the interests of justice and judicial  
24 economy would be served by an order enlarging Defendants’ time to respond to this  
25 Complaint and setting an agreed briefing schedule for any motion to dismiss the operative  
26 complaint.

27 **STIPULATION**

28 NOW THEREFORE, the undersigned parties hereby stipulate as follows:

1           1.       Lead Plaintiff(s) shall file a Consolidated Amended Complaint or file a  
2 notice of election to proceed on the current complaint no later than 60 days from the date of  
3 entry of an order consolidating any actions involving some or all of the same claims against  
4 the same Defendants and/or appointing Lead Plaintiff(s) and Lead Counsel.

5           2.       Defendants shall have 60 days after the filing and service of the  
6 Consolidated Amended Complaint or Lead Plaintiffs' election to proceed on the current  
7 complaint to answer or otherwise respond to the operative complaint.

8           3.       Lead Plaintiffs shall have 60 days to respond to any motion filed by  
9 Defendants in response to the operative complaint, unless otherwise agreed to by the  
10 parties.

11          4.       Defendants shall have 30 days after service of Lead Plaintiffs' response to  
12 serve a reply, unless otherwise agreed to by the parties.

13           Dated: December 4, 2006       BRAMSON, PLUTZIK, MAHLER &  
14   BIRKHAUSER LLP  
15   ALAN R. PLUTZIK.  
16   L. TIMOTHY FISHER  
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21   MARC A. TOPAZ  
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23   ALISON K. CLARK  
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24   Radnor, PA 19087  
25   Fax: (610) 667-7056

26   By [Concurrence obtained per Gen. Order 45]  
27   Kathryn A. Schofield  
28   Attorneys for Plaintiffs

29           I, Andrew D. Lanphere, am the ECF user whose ID and password are being used to  
30 file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order  
31 45, X.B., I hereby attest that plaintiffs' counsel Kathryn A. Schofield has concurred in this  
32 filing.

1 Dated: December 8, 2006 PILLSBURY WINTHROP SHAW PITTMAN LLP  
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9 By /s/ Andrew D. Lanphere  
10 Andrew D. Lanphere

11 Attorneys for Defendant  
MARVELL TECHNOLOGY GROUP, LTD  
12  
13

14 **[PROPOSED] ORDER**

15 Pursuant to the foregoing stipulation, and good cause appearing,

16 IT IS SO ORDERED. subject & amendment by the Court to whom these cases are ultimately

17 Dated: December \_\_, 2006. assigned.

18  
19   
20 United States District Judge  
21  
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